

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO 04-11607 DPW

HEIDI K. ERICKSON
Plaintiff

MOTION TO RECUSE

COMMONWEALTH OF MASSACHUSETTS
MITT ROMNEY, GOVERNOR et al
Defendants

1. Plaintiff respectfully files this Motion to Recuse Judge Woodlock from hearing her urgent and/or emergency Motions for Preliminary Injunction, and TRO to prevent the continued, pervasive, neglectfully and prolonged animal abuse and veterinarian malpractice that is harming Ms. Erickson's beloved Persians and hurting her physically and emotionally.
2. Ms. Erickson states that these issues of neglect, mistreatment and malpractice extremely harmful to her emotionally and in fear for the lives of her beloved Persian family, who could at any day be sentenced to death by lethal injection or gas in 10 days time. Ms. Erickson's gentle family of Persians suffering from the lack and/or inadequacies of the Commonwealth's custodian namely the Animal Rescue League (the largest known animal organization (Public charity) who euthanizes more animals then any other shelter in the six states comprising New England whose public trust holding (supervised by the attorney general's office) ~~is~~ nearly 100 million dollars and who is spending less then .001% of the funds on direct medical care for animals.
3. Ms. Erickson is fearful that Judge Woodlock has made previous assertions about Ms. Erickson's filings that tends to make Him biased, and not impartial to the circumstances and its urgency ~~and/or~~ (harmful impact on Ms. Erickson and/or her property) On May 4th, 2004 His Honor Woodlock issued a rather biased decision in Ms. Erickson's case where she was seeking relief, ordered to sanction her and to further enjoin her from filings in this Court without leave of Court but then failed to clarify his Orders upon Ms. Erickson's Motion to Clarify supported ^{HER PLEADING WITH} by references to facts that tended to supported and prove Ms. Erickson's

WHERE MS ERICKSON

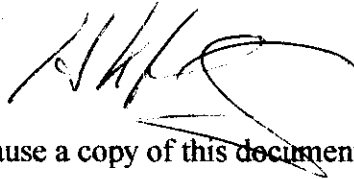
credibility and support the issuance of a TRO, Preliminary Injunction ^{WHILE} ~~and~~ Judge Woodlock's ~~Order~~ ^{Order} is denied.

4. Included in Judge Woodlock's decision he has referred to Erickson's well supported pleadings as vexatious, meritless actions after meritless action. These descriptive alone would make the argument that Judge Woodlock's possibility has more than mere implications of bias, but because this case has not been assigned a hearing date for short order in light of the harm and inhumane neglect occurring with Ms. Erickson beloved Persians any reasonable person would conclude there is more than a strong likelihood of bias and or potential for bias.

THEREFORE,

Erickson respectfully requests that His Honor Judge Woodlock recuse Himself from this case to be assigned immediately to another.

RESPECTFULLY SUBMITTED BY:



Heidi K. Erickson

By signature herein I attest that I have cause a copy of this document upon the Defendants and/or their attorney.